IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):	Larry W. White, James Hunter Enis		
Assignee:	Dell Products L.P.		
Title:	Solution Network Excursion Module		
Serial No.:	10/696,942	Filing Date:	October 30, 2003
Examiner:	Peter D. Coughlan	Group Art Unit:	2129
Docket No.:	DC-05626	Customer No.:	33438

Austin, Texas
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PRE-APPEAL BRIEF REQUEST FOR REVIEW
AND STATEMENT OF REASONS

Sir:

Applicant requests review of the Final Rejection in the above-identified application. No amendments are being filed with the request. This request is being filed with a Notice of Appeal. The following sets forth a succinct, concise, and focused set of arguments for which the review is being requested.

CLAIM STATUS

Claims 1, 5, 9, 13, 14, 17, and 20 stand rejected under 35 U.S.C. § 112, first paragraph.

Claims 1, 8, 9, 16, 17 and 24 stand rejected under 35 U.S.C. § 102(e) over Wu et al., U.S. Patent Publication No. 20040083213 (Wu). Claims 2 – 7, 10 – 15, and 18 – 23 stand rejected over Collins, et al, U.S. Patent Publication No. 20040243998 (Collins) in view of Markham, U.S. Patent Publication No. 20030158795 (Markham).

REMARKS

The following remarks provide applicants' position regarding how the claims distinguish over the art of record. While not discussed herein, all the arguments presented regarding hindsight reconstruction and suggestion to combine are maintained.

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Claims 1, 9 and 17 stand rejected based upon the term "system basis". However, claims 1, 9 and 17 were amended in the Response filed on April 26, 2006 to set forth "system model basis". It is respectfully submitted that those skilled in the art would appreciate based upon the specification and claims that a "system model basis" is a basis where information is stored based upon a system model. Claims 5 and 13 stand rejected based upon the term "system model identifier". It is respectfully submitted that those skilled in the art would appreciate based upon the specification and claims that a "system model identifier" is an identifier for a system model. Claims 6, 14 and 20 stand rejected based upon the term "system manufacture date". It is respectfully submitted that those skilled in the art would appreciate based upon the specification and claims that a "system manufacture date" is the date on which the manufacture of a system is completed.

The present invention generally relates to a knowledge management system which includes the ability to flag predetermined systems that have a known exception (i.e., an excursion) and render a solution based upon the known excursion.

More specifically, the present invention, as set forth by independent claim 1, relates to a method for identifying excursions to general solutions provided by a solution network. The method includes identifying excursions to a general solution on a system model basis, saving the excursions within the solution network on a model system basis, and when accessing the solution network, searching the solution network to determine whether an excursion solution exists.

The present invention, as set forth by independent claim 9, relates to an apparatus for identifying excursions to general solutions provided by a solution network. The apparatus includes means for identifying excursions to a general solution on a system model basis, means for saving the excursions within the solution network on a system model basis, and means for searching the solution network to determine whether an excursion solution exists when accessing the solution network.

The present invention, as set forth by independent claim 17, relates to a solution network which includes a knowledge repository, an excursion identifying module, and a search module. The knowledge repository stores information regarding general solutions relating to issues and information relating to excursions to general solutions. The excursions are searchable on a system model basis. The excursion identifying module identifies excursions to the general solutions on a system basis. The search module searches the solution network to determine whether an excursion solution exists when accessing the solution network.

Wu discloses solution searching. More specifically, Wu provides for solution searching during a session with a user. The user creates a search request for a solution. A data store provides refinement criteria that are displayed to the user. The refinement criteria are associated with the search request. The user then selects the refinement criteria. In response, the data store provides solutions that are displayed to the user. The solutions are associated with the search request and the selected refinement criteria. The user selects the solutions. The search request, the selected refinement criteria, and the selected solutions for the session are then stored in the data store.

Collins discloses restoring a software image of a customer information handling system to the same software image the system had when leaving the factory. The customer information handling system enters a re-imaging mode where the system requests a software download server to recreate the software image originally shipped with that particular information handling system. Once the replacement software image is created, the customer information handling system downloads the replacement software image to the media drive of the customer information handling system.

Markham relates to quality management and manufacturing with labels and smart tags in event based product manufacturing. Markham discloses a process control system which includes sensors which generate an alarm in response to an event. (See e.g., Markham ¶8) Markham sets forth that events may affect productivity of a process and that adverse productivity events are events that adversely affect the productivity of a process. (See e.g., Markham ¶42.)

Wu, Collins and Markham, taken alone or in combination, do not teach or suggest a method for identifying excursions to general solutions provided by a solution network much less such a method which includes identifying excursions to a general solution on a system model basis, saving the excursions within the solution network on a system model basis, and when accessing the solution network, searching the solution network to determine whether an excursion solution exists, all as required by claim 1. Accordingly, claim 1 is allowable over Wu, Collins and Markham. Claims 2 - 8 depend from claim 1 and are allowable for at least this reason.

Wu, Collins and Markham, taken alone or in combination, do not teach or suggest an apparatus for identifying excursions to general solutions provided by a solution network much less such an apparatus includes means for identifying excursions to a general solution on a system model basis, means for saving the excursions within the solution network on a system model basis, and means for searching the solution network to determine whether an excursion solution exists when accessing the solution network, all as required by claim9. Accordingly, claim 9 is allowable over

Wu, Collins and Markham. Claims 10 - 16 depend from claim 9 and are allowable for at least this reason.

Wu, Collins and Markham, taken alone or in combination, do not teach or suggest a solution network which includes, a knowledge repository and an excursion identifying module, much less such a solution network where the knowledge repository stores information regarding general solutions relating to issues and information relating to excursions to general solutions and the excursions are searchable on a system model basis; the excursion identifying module identifies excursions to the general solutions on a system basis; and the search module searches the solution network to determine whether an excursion solution exists when accessing the solution network, all as required by claim 17. Accordingly, claim 17 is allowable over Wu, Collins and Markham. Claims 18 - 24 depend from claim 17 and are allowable for at least this reason.

In view of the arguments set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, please telephone the undersigned.

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